

EXHIBIT A



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October 28, 2015

By Electronic Mail

Gerard Stranch
Ben Gastel
Branstetter, Stranch & Jennings, PLLC
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223 Rosa L. Parks Avenue, Suite 200
Nashville, TN 37203

Mark Chalos
Lief Cabraser Heimann & Bernstein, LLP
150 Fourth Avenue North
Suite 1650
Nashville, TN 37219

Re: New England Compounding Center MDL

Counsel:

I write on behalf of Saint Thomas Network, Saint Thomas Health and Saint Thomas West Hospital, formerly known as St. Thomas Hospital.

Please provide us with dates for deposition of the thirteen plaintiffs in the remaining bellwether candidates and, where applicable, spouses with a loss of consortium claim. We propose scheduling spouses on the same day, with the spouse's deposition commencing immediately after the plaintiff's and continuing the next day if needed. Based on the number of schedules implicated by these depositions, **we request at least 5 available dates per deponent.**

October 28, 2015
Page 2

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Based on our records, that results in the following 21 witnesses currently needing to be scheduled for deposition:

1. John L. Temple (individually and as estate administrator)
2. Denis Brock
3. Jerry Brandt Brock (spouse)
4. Phillip Tyree
5. Maria Tyree (spouse)
6. Mae Parman
7. Reba M. Skelton
8. Roy H. Skelton (spouse)
9. Fredia Berry
10. Jon Kinsey
11. Donna Branham
12. Adam C. Ziegler
13. Sarah D. Ziegler (spouse)
14. Lewis Ray Sharer
15. Barbara J. Sharer (spouse)
16. Basil McElwee
17. Carla McElwee (spouse)
18. Jane R. Wray a/k/a Beverly Jane Wray
19. Gerald W. Wray (spouse)
20. Anna M. Sullivan
21. C. Dale Sullivan, Sr. (spouse)

October 28, 2015
Page 3

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We are hopeful you will agree to respond to our document requests within fourteen days and to produce documents that are not being withheld based on an objection within thirty days as proposed at our recent meeting and requested in our proposed scheduling order. We of course will do the same. That should allow us to start depositions the week of November 16th, with the goal of completing this first round by December 18th. We can then schedule additional fact witnesses in January 2016 for the bellwether cases that remain at that time.

Let me know if you would like to discuss.

Very truly yours,


Yvonne K. Puig

cc (via electronic mail):
Adam Schramek
Eric Hoffman
Chris Tardio
Matt Cline